

LEVIN-EPSTEIN & ASSOCIATES, P.C.

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February 1, 2024

VIA ECF

The Honorable Jennifer H. Rearden, U.S.D.J.
U.S. District Court, Southern District of New York
500 Pearl St.
New York, NY 10007-1312

Re: *Lopez Rios v. Quality Sheet Metal, Inc. et al*
Case No.: 1:23-cv-05509-JHR

Dear Honorable Judge Rearden:

This law firm represents Plaintiff Oscar Ivan Lopez Rios (the “Plaintiff”) in the above-referenced matter.

Pursuant to Your Honor’s Individual Motion Practice Rules, this letter respectfully serves to request a *nunc pro tunc* extension of time to file Plaintiff’s Motion for Default Judgment as against Defendants Quality Sheet Metal, Inc. and Narendra Lachmansingh (together, the “Defendants”) from January 29, 2024 to, through and including, February 29, 2024.

This is the first request of its kind. If granted, this request would not affect any other Court-scheduled deadlines.

The basis for this request is that the undersigned law firm is in the process of obtaining necessary information from Plaintiff in support of the Motion for Default Judgment. The undersigned law firm anticipates being in a position to obtain the necessary information, and finalize the Motion for Default Judgment, on or before February 29, 2024.

In light of the foregoing, Plaintiff respectfully requests an extension of time to file Plaintiff’s Motion for Default Judgment as against Defendants from January 29, 2024 to, through and including, February 29, 2024.

Thank you, in advance, for your time and attention to this matter.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

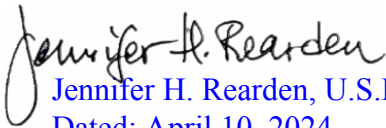
By: /s/ Jason Mizrahi
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VIA ECF: All Counsel

Application GRANTED IN PART. By **Wednesday, April 17, 2024**, Plaintiff shall file a motion for default judgment. In the instant application, counsel represented that he “anticipate[d] being in a position to obtain the necessary information, and finalize the Motion for Default Judgment,” nearly six weeks ago—“on or before February 29, 2024.” ECF No. 15. **If Plaintiff fails to move for a default judgment by April 17, 2024, then the Court will dismiss the action for failure to prosecute without further notice to the parties.** This deadline will not be further extended.

The Clerk of Court is directed to terminate ECF No. 15.

SO ORDERED.

A handwritten signature in black ink, reading "Jennifer H. Rearden". The signature is written in a cursive, flowing style. The first name "Jennifer" is written in a larger, more prominent script, while "H. Rearden" is written in a smaller, more compact script.

Jennifer H. Rearden, U.S.D.J.

Dated: April 10, 2024